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May 27, 1993

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: ET Docket No. 92-9;
NOTICE OF EX PARTE COMMUNICATION

Dear Ms. Searcy:

In accordance with Section 1.1206(a)(1) of the Commission's Rules and Regulations, there is provided herewith, in duplicate, a photocopy of an ex parte communication transmitted this day to Dr. Thomas M. Stanley, Chief Engineer, Office of Engineering and Technology concerning the above-captioned docket proceeding. This communication was made on behalf of the American Petroleum Institute ("API") concerning the above-referenced Commission Notice and Comment rule making proceeding.

API's position in this proceeding is fully discussed in the attached correspondence. Please place a copy of this letter and

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Dr. Thomas P. Stanley
May 27, 1993
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channeling plan of Alcatel for one or more of the higher range spectrum bands would simultaneously be adopted with a rechannalization arrangement devised by the Telecommunications Industry Association ("TIA") for the remaining bands.

API is adamantly opposed to this proposal and agrees with UTC that adoption of such a "mixed rechannalization" scheme would likely result in each manufacturer developing equipment that complies with only one band plan, thereby stifling competition for equipment sales in all rechannalized microwave bands. API also agrees with UTC that, should the Commission adopt a consistent channeling plan for all bands, it is more likely that multiple suppliers will produce equipment acceptable for operations in all the rechannalized bands. Moreover, a single channeling plan will not only expand user equipment choices but will also reduce the costs of relocation from the 2 GHz band, and thereby benefit emerging technology licensees. Accordingly, API respectfully urges the Commission to adopt a consistent channeling plan for all bands for which rechanneling is proposed.

Respectfully submitted,

THE AMERICAN PETROLEUM INSTITUTE

By: Christine Gill

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